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10 IN THE UNITED STATES DISTRICT COURT
11 DISTRICT OF OREGON
12 MEDFORD DIVISION

13 DONALD L. OLSON, as TRUSTEE OF THE
14 OLSON LIVING TRUST,

15 Case No. 1:15-cv-1692

v.
16 Plaintiff,

NOTICE OF REMOVAL

17 CHICAGO TITLE INSURANCE COMPANY,
18 successor to TICOR TITLE INSURANCE
19 COMPANY,

(Josephine County Case #15-CV-20794)

Defendant.

20 TO: Clerk, United States District Court for the District of Oregon

21 And to: Plaintiff, DONALD L. OLSON, as TRUSTEE OF THE OLSON LIVING
22 TRUST

23 And to: Carl A. Clyde, Esq., Attorney for Plaintiff

Defendant, Chicago Title Insurance Company (“CTIC”) hereby Removes the
captioned cause, originally filed in Josephine County, Oregon Circuit Court, Case number 15-
CV-20794, to the United States District Court for the District of Oregon. CTIC Removes the
case pursuant to 28 U.S.C. §1332 and 28 U.S.C. §1441(b), on the following grounds:

NOTICE OF REMOVAL – 1

FIDELITY NATIONAL LAW GROUP
1200 – 6th AVENUE, SUITE 620
SEATTLE, WA 98101
(206) 223-4525

1. On or about August 6, 2015, Plaintiff filed a Complaint in Josephine County,
2. Oregon Circuit Court, Case number 15-CV-207944.
3. CTIC received a copy of the Summons and Complaint on August 13, 2015. This
4. Notice of Removal is timely under 28 U.S.C. §1446(b) because it is within 30 days
5. after CTIC received notice of the Summons and Complaint.
6. Copies of all additional records and proceedings in the State Court will be filed
7. together with the Verification of State Court Records as required by 28 U.S.C.
8. §1446(a).
9. Plaintiff is a citizen of the State of Oregon.
10. Defendant CTIC is a Nebraska corporation.
11. CTIC is the only Defendant having been served with a summons and complaint in
12. this action.
13. This action is a civil action of which this Court has original jurisdiction under 28
14. U.S.C. §1332, and which may be removed to this court by Defendant CTIC
15. pursuant to 28 U.S.C. §1441(b) as a civil action between citizens of different states
16. and the matter in controversy exceeds the sum of \$75,000 exclusive of interest and
17. costs.
18. The original case was filed in Josephine County, Oregon Circuit Court.
19. Accordingly, this case should be assigned to the United States District Court for
20. the District of Oregon, at Medford, pursuant to 12 U.S.C. §632 and Local Rule 3-
21. 2(a).

9. CTIC will promptly file a copy of this Notice with Deschutes County Circuit Court and all parties.

10. Pursuant to 28 U.S.C. §1332 and 28 U.S.C. 1441(b), no further action may occur in the state court unless and until the action is remanded.

Wherefore, Defendant CTIC respectfully gives notice that the above-entitled action is removed from the Deschutes County, Oregon Circuit Court to the U.S. District Court for the District of Oregon, Medford Division.

Dated: September 8, 2015

/s/ *Matthew Cleverley*

Matthew R. Cleverley, WSBA #32055
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Attorney for CTIC

CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned, a citizen of the United States, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On the date given below I caused to be served the foregoing NOTICE OF REMOVAL on the following individuals in the manner indicated:

Carl A. Clyde OSB #095782
Sorenson, Ransom & Ferguson, LLP
133 NW D Street
Grants Pass OR 97526
541-476-3883 – Phone
541-474-4495 – Fax
cclyde@roguevalleylaw.com
Attorney for Plaintiff

U.S. Mail, proper postage affixed
 Legal Messenger
 Facsimile
 Hand Delivery
 ECF/email

Attorney for Plaintiff

Dated: September 8, 2015

/s/ Matthew Cleverley

Matthew R. Cleverley, WSBA #32055